

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:

CHAPTER 13 CASE NO.:

MICHAEL W. MONAGHAN, JR.

20-12239-JDW

TRUSTEE'S RESPONSE TO MOTION TO EXTEND DEADLINE

COMES NOW Locke D. Barkley, Chapter 13 Trustee (the "Trustee"), by and through counsel, and files this Response to Motion to Extend Deadline (the "Response") to the Debtor's Motion for Extension of Time to File Required Documents (Dkt. #7) (the "Motion") and requests that the Motion and the Response be considered on an expedited basis and in support thereof states as follows:

1. The Debtor initiated this proceeding with the filing of a voluntary petition for relief on July 2, 2020.
2. To comply with Rule 2003(a), the Trustee must set the section 341(a) meeting of creditors for August 20, 2020. To allow for proper notice of the meeting, all schedules, statements, documents, and the chapter 13 plan should be filed no later than July 26, 2020.
3. The Trustee has no objection to an extension of time for the required filings; however, such extension should be limited to July 26, 2020, or a date prior thereto.
4. The Trustee requests that any order granting an extension be limited as set forth above, and provide that the failure of the Debtor to make the timely filings will result in the dismissal of this case without further notice or hearing.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that upon notice and hearing that this Court enter its order granting the Motion on a limited basis as set forth herein. The Trustee also prays for such other relief to which she and this bankruptcy estate may be entitled.

Dated: July 17, 2020

Respectfully submitted,
LOCKE D. BARKLEY, TRUSTEE

/s/ W. Jeffrey Collier
ATTORNEYS FOR TRUSTEE
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CERTIFICATE

I, the undersigned attorney for the Trustee, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Debtor, attorney for the Debtor, the United States Trustee, and other parties in interest, if any, as identified below.

Dated: July 17, 2020

/s/ W. Jeffrey Collier
W. JEFFREY COLLIER